



# CORNERSTONE

Environmental Group, LLC

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VIA E-MAIL AND US MAIL

April 4, 2013

Mr. Jonathan Gorin  
Remedial Project Manager  
United States Environmental Protection Agency, Region II  
290 Broadway  
19<sup>th</sup> Floor  
New York, New York 10007-1866

Subject: Monthly Progress Report for March 2013  
LCP Chemicals, Inc. Superfund Site (USEPA ID# NJD079303020)

Dear Mr. Gorin:

The following monthly progress report is submitted on behalf of ISP Environmental Services Inc. (IES) in satisfaction of the Section VIII.35 requirements of Administrative Order No. II CERCLA-02-99-2015 (hereinafter referred to as the Order) issued by USEPA and as executed by IES on May 13, 1999.

A "Gantt Chart" project schedule is provided as an attachment (Figure 1). This project schedule provides graphical representations of the project tasks and subtasks. Accordingly, the project schedule depicts the task completion through the end of the reporting month and provides an estimate of the timing of future tasks.

## 1. Previous Actions in Compliance with the Order

### A. The following actions have been taken to comply with the Order during the previous month:

- Received final input from the USEPA on the response to the Agency's comments on the Draft Remedial Investigation Report (RIR), and began preparation of the final RIR.
- Continued work on responding to comments on the Draft Baseline Ecological Risk Assessment (Appendix Q to the RIR), based on final comments received from the Agency in a letter dated January 16, 2013.

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- Began preparation of a response to comments from the USEPA on the Draft Feasibility Study (FS) report, as provided by the Agency in a letter dated February 11, 2013.
- B. The following documents were submitted to the agencies during the previous month:
- Monthly progress letter report dated March 5, 2013, including an updated project schedule dated March 1, 2013.
- C. The following agency approvals were received during the previous month:
- None during the reporting period.
- D. The following agency documents and correspondences were received during the previous month:
- Electronic mail message from Jonathan Gorin of the USEPA to John Hoffman of Ashland and Carrie McGowan of EHS-Support, dated March 5, 2013, providing a copy of a draft Administrative Order on Consent (AOC) and associated Exhibit A, for relocation of a Praxair nitrogen line across the LCP property. This was followed by a conference call on March 18, 2013 between representatives of the USEPA, Ashland, and EHS-Support to discuss the AOC.
- E. Other pertinent communications with the agencies during the previous month:
- Electronic mail message from Jonathan Gorin of the USEPA to John Hoffman of Ashland and Carrie McGowan of EHS-Support, dated March 12, 2013, transmitting an electronic mail message from Nancy Hamill of the NJDEP regarding barium and zinc as ecological COPCs.
  - Electronic mail message from Jonathan Gorin of the USEPA to John Hoffman of Ashland and Carrie McGowan of EHS-Support, dated March 13, 2013, providing a conditional approval of the October 11, 2012 Final Response to Comments Letter on the Draft RIR. The approval is subject to responding to two comments (Ba and Zn as ecological COPCs and wording change regarding impact to groundwater soil criteria) and did not cover the investigation of off-site ditches.
  - Electronic mail message from Jonathan Gorin of the USEPA to John Hoffman of Ashland and Carrie McGowan of EHS-Support, dated March 29, 2013, providing a conditional approval of the investigation of the off-site ditches subject to modification of Figures 5-21 and 5-22 of the RIR.
  - Electronic mail message from Jonathan Gorin of the USEPA to John Hoffman of Ashland and Carrie McGowan of EHS-Support, dated March 29, 2013, providing

clarification of the USEPA's preferred method of delivery and number of copies of the RIR and BERA when these documents are finalized.

## 2. Future Actions, Data, and Plans

A. The following actions, data, and plans are scheduled to be conducted during the following two (2) months contingent on the USEPA's final approval of remaining responses to Agency comments on the RIR and BERA and responses to comments on the draft FS report:

- Prepare the final *Remedial Investigation Report* for submittal to the USEPA.
- Prepare the final *Baseline Ecological Risk Assessment* for submittal to the USEPA.
- Address the final comments from the USEPA on the Draft Feasibility Study report submitted by IES, and begin preparation of the final FS report.
- Continue work to properly dispose of the tank that moved during Hurricane Sandy.

B. Other information related to the progress of work:

- None during this reporting period.

## 3. Project Schedule

A. The percentage of completion of the project subtasks has been updated and is shown on the overall project schedule (Figure 1). Many of the schedule subtask details including the Phase I and Phase II RI field investigations and the treatability study determination process are 100% complete and have been collapsed for presentation brevity on Figure 1. With the submittal to the USEPA of the revised draft RI report and the draft FS report, the schedule is controlled by the USEPA review process. Coordination with the USEPA is ongoing regarding the review process. Based on the current status of coordination with the USEPA on the RI and BERA, the schedule remains unchanged from the previous progress report and these documents are projected to be finalized on or about June 21, 2013. Coordination with the USEPA regarding comments on the draft FS report is continuing, and based on the status of this effort, the schedule has been extended by approximately one month. As the time necessary to complete the review process and prepare final RI and FS documents is further defined, the schedule will be updated accordingly.

B. Delays that have been encountered or anticipated that may affect the future schedule for completion of the work:

- No specific delays are being encountered at this time, and the current schedule reflects the continuation of coordination with the USEPA to finalize the draft RI and FS reports.

C. Description of efforts made to mitigate these delays or anticipated delays:

- None necessary at this time.

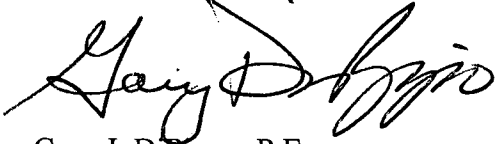
**4. Funding Mechanism**

- A. An Irrevocable Letter of Credit No. P-224827, issued by JP Morgan Bank effective April 25, 2002, and associated Standby Trust Agreement were issued in satisfaction of the financial assurance obligations of the Order as documented to USEPA in a letter from Celeste Wills, Esq. of IES, dated April 26, 2002.

If you or your staff has any questions or comments, please do not hesitate to contact John Hoffman of Ashland Inc. at 302-995-3485.

Sincerely,

**CORNERSTONE ENVIRONMENTAL GROUP, LLC**



Gary J. DiPippo, P.E.  
Manager, Hydrogeology and Remediation

Enclosure

cc: J. Hoffman, Ashland Inc.	C. McGowan, EHS Support
S. Miller, NJDHSS	S. MacMillin, Brown and Caldwell
F. Cardiello, Esq., USEPA	K. Tolson, Geosyntec
D. Toft, Esq.	M. DeFlaun, Geosyntec
A. Pavelka, NJDEP	J. Kubitz, Entrix
R. Lampkin, Ashland	

Figure 1  
RI/FS PROJECT SCHEDULE  
LCP Chemicals, Inc. Superfund Site

